

1 Scott E. Gizer, Esq., Nevada Bar No. 12216  
2 *sgizer@earlysullivan.com*  
3 Sophia S. Lau, Esq., Nevada Bar No. 13365  
4 *slau@earlysullivan.com*  
5 EARLY SULLIVAN WRIGHT  
6 GIZER & McRAE LLP  
7 8716 Spanish Ridge Avenue, Suite 105  
8 Las Vegas, Nevada 89148  
9 Telephone: (702) 331-7593  
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277  
12 *ksinclair@sinclairbraun.com*  
13 SINCLAIR BRAUN LLP  
14 16501 Ventura Blvd, Suite 400  
15 Encino, California 91436  
16 Telephone: (213) 429-6100  
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants  
19 FIDELITY NATIONAL TITLE GROUP, INC., FIDELITY  
20 NATIONAL TITLE INSURANCE COMPANY, CHICAGO  
21 TITLE INSURANCE COMPANY, and CHICAGO TITLE OF  
22 NEVADA, INC.

23 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
24 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

25 Gary L. Compton, State Bar No. 1652  
26 2950 E. Flamingo Road, Suite L  
27 Las Vegas, Nevada 89121

28 **UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

BANK OF AMERICA, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC. et al.,

Defendants.

Case No.: 2:21-CV-00971-GMN-EJY

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
COMPLAINT**

**SECOND REQUEST**

COMES NOW defendants Fidelity National Title Group, Inc. (“FNTG”), Fidelity National Title Insurance Company (“Fidelity”), Chicago Title Insurance Company (“Chicago Title”) and Chicago Title of Nevada, Inc. (“Chicago Agency”) (collectively “Defendants”) and plaintiff Bank of America, N.A. (“BANA”), by and through their respective attorneys of record, which hereby



1 agree and stipulate as follows:

2 1. On May 19, 2021 BANA filed its complaint in the Eighth Judicial District Court  
3 for the State of Nevada;

4 2. On May 20, 2021, Chicago Title removed the instant case to the United States  
5 District Court for the State of Nevada (ECF No. 1);

6 3. On June 23, 2020, the Court granted the Parties first stipulation extending the time  
7 for Defendants to respond to the complaint until July 29, 2021 (ECF No. 10);

8 4. Counsel for Defendants request a 32-day extension, through and including  
9 Monday, August 31, 2021 for Defendants to file their respective responses to BANA's complaint  
10 to afford Defendants' counsel additional time to review and respond to the allegations of BANA's  
11 complaint.

12 5. Counsel for BANA does not oppose the requested extension;

13 6. This is the second request for an extension made by counsel for Defendants, which  
14 is made in good faith and not for the purposes of delay.

15 7. This stipulation is entered into without waiving any of Defendants' objections  
16 under Fed. R. Civ. P. 12.

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //



1           **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the  
2 complaint are hereby extended through and including Monday, August 31, 2021.

3 Dated: July 27, 2021

SINCLAIR BRAUN LLP

4  
5 By: /s/-Kevin S. Sinclair  
6 KEVIN S. SINCLAIR  
7 Attorneys for Defendants  
8 FIDELITY NATIONAL TITLE GROUP,  
9 INC., FIDELITY NATIONAL TITLE  
10 INSURANCE COMPANY, CHICAGO  
11 TITLE INSURANCE COMPANY and  
12 CHICAGO TITLE OF NEVADA, INC.

13 Dated: July 27, 2021

WRIGHT FINLAY & ZAK, LLP

14 By: /s/-Christina V. Miller  
15 CHRISTINA V. MILLER  
16 Attorneys for Plaintiff  
17 BANK OF AMERICA, N.A.

18 **IT IS SO ORDERED.**

19 Dated this 27th day of July, 2021.

20  
21  
22  
23  
24  
25  
26  
27  
28  
  
29 ELAYNA J. YOUCHAH  
30 UNITED STATES MAGISTRATE JUDGE